

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., ¹)	Case No. 25-10068 (CTG)
)	
Debtor.)	
)	

**CERTIFICATION OF COUNSEL REGARDING APPROVAL
OF JOINT STIPULATION REGARDING CLAIMS OF
BAYSHORE VILLAGE (US), INC.**

Ann Aber, solely in her capacity as the Plan Administrator (the “Plan Administrator”) appointed in the above-captioned cases, and Bayshore Village (US), Inc. (“Landlord” and together with the Plan Administrator, collectively, the “Parties”), entered into a stipulation (as defined below) and hereby certifies as follows:

1. The Landlord’s lease was terminated.
2. On or about February 12, 2025, Landlord filed a Proof of Claim designated as Claim 423. Claim 423 asserts claims totaling \$49,752.02, including administrative expense claims totaling \$13,060.84.
3. The administrative expense claim portion of Claim 423 has been paid in part, as Landlord acknowledges the receipt of \$5,307.73 subsequent to the filing of Claim 423 against its administrative rent claim, leaving an administrative claim which is comprised in part of claims that are valid as an administrative expense and in part general unsecured claims.
4. Plan Administrator and the Landlord have agreed to resolve the administrative claims set forth in Claim 423 by the payment of \$2,424.46, and further agreed that upon Landlord’s

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

receipt of such payment the administrative expense claims set forth in Claim 423 shall be deemed withdrawn with prejudice as administrative expense claims, and such claims, totaling \$5,328.65, shall be deemed re-classified in their entirety as a general unsecured claim.

5. Accordingly, the Parties have entered into that certain *Joint Stipulation Regarding Claims of Bayshore Village (US), Inc.* (the “Stipulation”) memorializing their agreement that the Pinterest Advertising Agreement shall be deemed rejected effective as of May 23, 2025 pursuant to the Stipulation.

6. A proposed order approving the Stipulation is attached hereto as **Exhibit A** (the “Proposed Order”).

7. A copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order.

8. Accordingly, the Parties request entry of the Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Dated: December 15, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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- and -

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